Case 4:12-cr-40026-WGY Document 581 Filed 07/28/14 Page 1 of 1

UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
v.) Criminal No. 12-40026-WGY
JOHN J. O'BRIEN,)
ELIZABETH V. TAVARES, and)
WILLIAM H. BURKE, III,)
Defendants.)

GOVERNMENT'S REQUEST FOR EXTENSION OF TIME

The government requests an extension of time until August 22, 2014 to file its statement of relevant facts with the United States Department of Probation so that the Probation Department can prepare the pre-sentence report (PSR) in the case at bar. In support of this motion the government states that the sentencing in this matter has been scheduled for November 18, 2014 and no hardship will result to the Probation Department from the delayed submission. Further, the government attorneys who prosecuted this matter would like to take some sorely needed leave time. Finally, US Probation Officer Iris Golus has been assigned to prepare the PSR in this case and does not oppose an extension of time until August 22, 2014.

Respectfully submitted,

Carmen M. Ortiz United States Attorney

By: /s/Fred M. Wyshak, Jr.
Fred M. Wyshak, Jr.
Karin M. Bell
Robert A. Fisher

Assistant U.S. Attorneys

CERTIFICATE OF SERVICE

I, Fred M. Wyshak, Jr., Assistant United States Attorney, do hereby certify that this document, was filed on the above date through the ECF system which sends copies electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and that paper copies will be sent to those indicated as non-registered participants on this date.

/s/ Fred M. Wyshak, Jr. FRED M. WYSHAK, JR. Assistant U.S. Attorney